

EXHIBIT A

U.S. CUSTOMS AND BORDER PROTECTION

Department of Homeland Security

FACSIMILE TRANSMITTAL

CD 2110-035

Date: 9/9/90

No. of Pages, including this cover sheet:

TO	Name:	[REDACTED]
	Organization:	[REDACTED]
	Fax Number:	
FROM	Sender:	[REDACTED]
	Originating Location:	Service Port of St. Louis 4477 Woodson Road, Suite 200 St. Louis, Missouri 63134
	Return FAX Number:	(314) 428-2975
	Voice Number:	(314) 428-2662 ext. 207
	Email:	Email: [REDACTED]
REMARKS	Petition. Let me know how you want me to respond to it.	

Important: This document may contain confidential and sensitive U.S. Government information. Please deliver it immediately only to the intended recipient(s) listed above. The Bureau of Customs and Border Protection has not approved the documents review, retransmission, dissemination or use by anyone other than the intended recipient(s).

CBP Form 3 (05/03)

From: [REDACTED]
Sent: Monday, November 30, 2009 11:29 AM
To: [REDACTED]
Cc: [REDACTED]
Subject: FW: 2009 4501 0000081 01
Attachments: [REDACTED]

*Indictment for [REDACTED]
 price is [REDACTED]
 under Adrian
 Dunn
 don't see you Kon or
 1709 [REDACTED]
 still need 6051*

I'm fairly certain that all the documents were sent to you previously regarding this seizure. [REDACTED] has sent you copies of the 6051 and 368 that relate to this seizure, and I am now sending you a copy of the search warrant. You should already have a copy of the indictment relating to this seizure.

Regarding DUNN's petition for the return of \$40,000 U.S. currency that was seized from the trunk of one of his vehicles: That vehicle as well as the money has been indicted. In his petition, DUNN claims that he earned the money from the sale of two vehicles: a 2003 Ford conversion van and a Chevy Corvette. Both of those vehicles have also been indicted. He also adds that some of the money comes from his towing business.

There is overwhelming evidence that clearly demonstrates that Adrian DUNN was actively obtaining cocaine from Alejandro CORREDOR and thereafter distributing that cocaine in Kansas City. Further information has been developed that shows that DUNN gave the aforementioned vehicles, the conversion van and the Corvette, to Alejandro CORREDOR as payment for a drug debt. This is in complete contradiction to DUNN's claim that part of the \$40,000 was earned through the sale of those vehicles.

Hopefully this information will help you formulate a response to DUNN's petition.

From: [REDACTED]
Sent: Monday, November 24, 2009 4:53 PM
To: [REDACTED]
Subject: FW: 2009 4501 0000081 01

I called [REDACTED] regarding the below email to try and resolve as much of it as I could. I've faxed her copies of the 6051 and 368.

I know nothing about the petition. I believe you have the search warrants and I'll let you explain to her the status of the case.

From: [REDACTED]
Sent: Tuesday, November 24, 2009 1:47 PM
To: [REDACTED]
Cc: [REDACTED]
Subject: 2009 4501 0000081 01

I never heard back from you about the petition. How do you want to respond to it?

11/30/2009

[REDACTED]
From: [REDACTED]

Sent: Monday, March 14, 2011 11:42 AM

To: [REDACTED]

[REDACTED]
We left messages for each other last week regarding this seizure. It was seized on June 12, 2009 and has been indicted; however, the owner of the vehicle, Adrian DUNN, was found guilty during a recent jury trial but the government failed to mention forfeiture of the car. We need to proceed with administrative forfeiture.

2009450100008101 Line Item #7

Thanks!

THE LAW OFFICE OF

PETERS & PETERS, P.C.

600 East 8th Street, Suite 100 Kansas City, Missouri 64106-1627

Office: (816) 474-360

Facsimile: (816) 474-307

PATRICK W. PETERS Licensed in Missouri and Kansas
SHELLEY M. PETERS Licensed in Missouri

December 9, 2009

Adrian Dunn
Bates County Law Enforcement Center
P.O. Box 60
Butler, MO 64730

RE: US vs. Adrian Dunn
Case no. 09-00188-04-CR-W-NKL

Dear Adrian:

Please find enclosed copies of the two letters dated December 2nd from U.S. Customs and Border Protection regarding the petition denial.

Sincerely,



Chuck Brecunier
Paralegal to
Patrick W. Peters
Shelley M. Peters

Enclosure



**U.S. Customs and
Border Protection**

file

(314) 428-2662 EXT. 207
FAX: (314) 428-2975

Date: December 2, 2009

Adrian Dunn
c/o Patrick Peters
600 East 8th, Suite A
Kansas City, Missouri 64106

RE: 2009 4501 000082 01

*(see petition in
bulet 81 for
\$140,000)*

Dear Sir:

Your client's petition (undated but received on September 4, 2009) has been denied due to the fact that this criminal case is still pending in the court system. Administrative Forfeiture proceedings have been held until pending the outcome of the case.

If for any reason you disagree with this formal action, you may file a supplemental petition within thirty (30) days from the date of this letter. Supplemental petitions must set forth new facts or evidence which justify reconsideration of our decision.

Sincerely,

Jaynie Zakibe

Jaynie Zakibe
Fines, Penalties & Forfeitures Officer



U.S. Customs and
Border Protection

(314) 428-2662 EXT. 207
FAX: (314) 428-2975

Date: December 2, 2009

Adrian Dunn
c/o Patrick Peters
600 East 8th, Suite A
Kansas City, Missouri 64106

RE: 2009 4501 000081 01

Dear Sir:

Your client's petition (undated but received on September 4, 2009) has been denied due to the fact that this criminal case is still pending in the court system. Administrative Forfeiture proceedings have been held until pending the outcome of the case.

If for any reason you disagree with this formal action, you may file a supplemental petition within thirty (30) days from the date of this letter. Supplemental petitions must set forth new facts or evidence which justify reconsideration of our decision.

Sincerely,

Jaynie Zakibe
Fines, Penalties & Forfeitures Officer

EXHIBIT B

To Whom it may Concern,
I Adrian L. Dunn Sr,
Am writing Concerning the 40,000.00 (Forty
thousand Dollars U.S. Currency) which was
Seized From the trunk of my 1974 Chevy
Caprice, VIN IN 47R 45212607, that was
Stored in the garage At the Resident
8717 Kentucky, Kansas City, MO 64134 which
was locked up without Keys present And
Alarm Armed. There was Actually 40,000.00
(Forty thousand Dollars U.S. Currency)
Seized. With All do Concern this U.S.
Currency was Accomplished by Car Sales
of A 2003 Ford Conversion Van, And Sold
For (Sixteen thousand Dollars U.S. Currency),
And Some that had to do with my 2005
Chevrolet Corvette. VIN 1G14Y220855128951,
that wasn't Fully Paid For, And Some
partially From my Towing Business, AD
Towing Towing LLC. With Much Concern
I Adrian L. Dunn Sr, Would like And
Appreciate that I would be reFunded
the 40,000.00 (Forty ~~thousand~~ thousand Dollars
U.S. Currency) Thank you!

REC'D FP&F

SEP - 4 2009

Customs & Border Protection
St. Louis, MO

Adrian L. Dunn Sr.
2009 4501 000081
2009 4501 000082